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10 *Attorney for Defendant AT&T*

11 **U.S. DISTRICT COURT FOR THE**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 **IN RE PORTFOLIO RECOVERY**
14 **ASSOCIATES, LLC**
15 **TELEPHONE CONSUMER**
16 **PROTECTION ACT**
17 **LITIGATION**

18 Case No.: 11-MD-02295-JAH-
19 BGS

20 Hon. John A. Houston
21 Hon. Bernard G. Skomal

22 **JOINT MOTION TO**
23 **DISMISS WITH PREJUDICE**

24 This Document Relates to *CLARK v.*
25 *PORTFOLIO RECOVERY*
26 *ASSOCIATES, LLC ET AL.*, Case No.
27 3:16-cv-02838-JAH-BGS

28 **IT IS HEREBY STIPULATED AND AGREED**, by and between all
29 parties to *Clark v. Portfolio Associates, LLC*, Case No. 3:16-cv-02838-JAH-BGS
30 (“the *Clark* action”), namely Plaintiff Robert Clark and Defendants Portfolio
31 Recovery Associates, LLC and AT&T Mobility LLC,¹ through their respective

32 ¹ The complaint incorrectly identifies AT&T Mobility by the brand name “AT&T.”

1 counsel, that the *Clark* action, including each claim and count therein asserted by
2 Plaintiff against the Defendants, shall be dismissed with prejudice pursuant to a
3 settlement and Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and with each party
4 to bear its own costs and attorneys' fees.

5 The parties to the *Clark* action respectfully request that the Court terminate
6 the *Clark* action by valid order pursuant to this Joint Motion to Dismiss with
7 Prejudice and direct the Clerk of this Court to transmit a copy of the same to the
8 Clerk of the United States Judicial Panel on Multidistrict Litigation pursuant to
9 J.P.M.L. Rule 10.1.

10
11 Dated: June 25, 2019

Respectfully submitted,

12
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CERTIFICATE OF SERVICE

I, Hans Germann, counsel for Defendant AT&T, hereby certify that service of the foregoing JOINT MOTION TO DISMISS WITH PREJUDICE was filed electronically and sent via email through the CM/ECF system to those parties who are registered Filing Users; and counsel were copied on the email transmitting the Proposed Order to the Honorable John A. Houston.

I further certify that the foregoing document and a copy of the Proposed Order were also served upon the parties below by causing copies of the same to be placed in the United States Mail, postage prepaid, and sent to their last known address as follows:

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